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February 3, 2003

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: MB Docket No. 02-277, MM Docket No. 01-235,
MM Docket No. 01-317, MM Docket No. 00-244

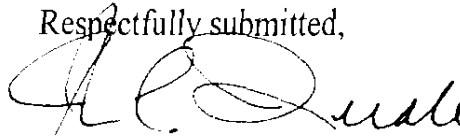
Dear Ms. Dortch:

Enclosed for inclusion in the record of the above-captioned proceedings, please find a copy of Professor Michael Katz's white paper entitled *Old Rules and New Rivals: An Examination of Broadcast Television Regulation and Competition* (September 1999), which originally was submitted to the Commission on November 18, 1999.

In the white paper, Dr. Katz, former Chief Economist of the Commission, determined that broadcasters face far more competition for advertising dollars, programming and viewers than they did when the Commission's ownership rules first were put into place. He concluded that the ownership rules *undermine* broadcasters' competitive position and no longer serve the public interest. By reducing the ability of the broadcast television industry to compete against the growing number of video outlets, the rules lower the economic welfare of both viewers and advertisers.

If you have any questions regarding this matter, please contact the undersigned.

Respectfully submitted,


John C. Quale

Enclosures

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Marlene Dortch
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cc: Ken Ferree, Media Bureau (via email)
Paul Gallant, Media Bureau (via email)
Susan M. Eid, Legal Advisor to Chairman Powell (via email)
Stacy Robinson, Legal Advisor to Commissioner Abernathy (via email)
Alex Johns, Legal Advisor to Commissioner Copps (via email)
Catherine Crutcher Bohigian, Legal Advisor to Commission Martin (via email)
Sarah Whitesell, Legal Advisor to Commission Adelstein (via email)

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SEE DOCKET NO. *02-277* FOR THE DOCUMENT.